

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

GIUSEPPE BETTIOL, derivatively on behalf
of ENERGY TRANSFER LP,

Plaintiff,

v.

LE GP LLC, KELCY L. WARREN,
THOMAS E. LONG, JOHN W.
MCREYNOLDS, MARSHALL S.
MCCREA, III, MATTHEW S. RAMSEY,
STEVEN R. ANDERSON, RICHARD D.
BRANNON, RAY C. DAVIS, MICHAEL K.
GRIMM, K. RICK TURNER, RAY W.
WASHBURNE, AND WILLIAM P.
WILLIAMS,

Defendants,

and

ENERGY TRANSFER LP,

Nominal Defendant.

Civil Action No. 3:19-cv-02890-X

STIPULATION [AND PROPOSED

ORDER]

STIPULATION [AND PROPOSED ORDER]

WHEREAS, on December 7, 2019, Plaintiff Giuseppe Bettiol (“Bettiol”), derivatively and on behalf of Energy Transfer LP (“Energy Transfer” or the “Company”) filed a Verified Unitholder Derivative Complaint (the “Complaint”) against Defendants Kelcy L. Warren, Thomas E. Long, John W. McReynolds, Marshall S. McCrea, III, Matthew S. Ramsey, Steven R. Anderson, Richard D. Brannon, Ray C. Davis, Michael K. Grimm, K. Rick Turner, Ray W. Washburne, and William P. Williams (collectively, the “Individual Defendants”) and Defendant LE GP, LLC (“LE GP” or

the “General Partner,” and together with the Company and the Individual Defendants, the “Defendants”) (the “Action”);

WHEREAS, Bettiol and the Defendants have met and conferred regarding service of the Complaint and a schedule for the action going forward;

WHEREAS the Parties desire to have additional time to discuss an appropriate schedule for this action;

IT IS HEREBY STIPULATED AND AGREED by the Parties and their undersigned counsel as follows:

1. Without waiving any affirmative defenses and otherwise reserving all rights, the Complaint in this Action shall be deemed served upon all Defendants;
2. By February 7, 2020, the Parties will submit a proposed schedule for responding to the Complaint in this Action and briefing any motions to dismiss that may be filed; and
3. All pre-trial deadlines that may apply in the Action (including any obligation of Defendants to respond to the Complaint) shall be stayed until deadlines for such filings are set by the Court following the Parties’ submission of a proposed schedule on February 7, 2020.

SO ORDERED this ____ day of _____, 20__.

UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Jeffrey S. Johnston

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